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6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
LLC,

16 Defendants.
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Case No.: 3:17-CV-00939 (WHA)

**NONPARTY LIOR RON'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PURSUANT TO
CIVIL L.R. 7-11 AND 79-5**

Magistrate Judge Jacqueline S. Corley

Pursuant to Civil Local Rules 7-11 and 79-5, Nonparty Lior Ron (“Nonparty” or “Ron”) by and through their counsel of record, respectfully submits this Administrative Motion for a Sealing Order (“Motion to Seal”) permitting Nonparty to file under seal selected portions of Ron’s Letter Brief in Response to Waymo’s Motion to Compel Inspection of Images (“Response”).

This Motion to Seal is supported by the Declaration of Jonathan A. Patchen filed concurrently with this Motion to Seal. *See* Civil L.R. 79-5(d)(1)(A) (stating that an administrative motion to seal must be accompanied by a declaration “establishing that the document sought to be filed under seal . . . [is] sealable.”).

Civil Local Rule 79-5(b) states that a document may only be filed under seal “pursuant to a court order that authorizes the sealing of the particular document” and requires the party seeking to file a document under seal to show that the document contains information that is “privileged, protectable as a trade secret or otherwise entitled to protection under the law.” Civil L.R. 79-5(b). “The request must be narrowly tailored to seek sealing only of sealable material, and must conform with Civil L.R. 79-5(d).” *Id.*

Mr. Ron’s Response contains information that has been designated “Confidential” and/or “Highly Confidential” by Defendants, Anthony Levandowski, or third-parties to this action. *See* Declaration of Jonathan A. Patchen ¶ 3; Civil L.R. 79-5(e). Pursuant to Civil Local Rule 79-5(d) and (e), Mr. Ron hereby move this Court for an order sealing the following portions of his Opposition:

<u>DOCUMENT/REFERENCES TO BE SEALED</u>	<u>PORTION(S) TO BE SEALED</u>	<u>DESIGNATING PARTY</u>
Portions of the footnote on p. 1	Highlighted in yellow	Defendants and/or Anthony Levandowski and/or other third-parties
Portions of Exhibit 1 to the Declaration of Jonathan Patchen	Highlighted in yellow	Defendants and/or Anthony Levandowski and/or other third-parties

Under Civil Local Rule 79-5(d), Mr. Ron has filed concurrently with this Motion to Seal

1 redacted and unredacted versions of his Opposition.

2 **CONCLUSION**

3 For the foregoing reasons, Nonparty Lior Ron respectfully requests that the referenced
4 unredacted version of his Opposition be lodged and filed under seal in this action.

5 Dated: September 26, 2017

Respectfully submitted,

7 TAYLOR & PATCHEN, LLP

10 By: /s/ Jonathan A. Patchen

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